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September 4, 2018

**VIA ECF**

Magistrate Judge Roanne L. Mann  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Mason et al v. Lumber Liquidators, Inc.*, Case No. 17-cv-04780 (MKB) (RLM) – Joint  
Motion to Extend Close of Discovery

Dear Judge Mann:

We represent Defendant Lumber Liquidators Inc. in the above-referenced matter. Along with counsel for the Plaintiffs, we submit this joint request for an extension of the fact discovery deadline.

Over the course of the last several months, the parties have exchanged, collectively, more than six sets of discovery and responses. The parties have also met and conferred productively on numerous occasions, resulting in the parties' narrowing their disagreements on critical issues such as, *inter alia*, pre-certification scope of discovery, sources of ESI, and relevant individual ESI custodians. The parties also spent great time and effort in preparing for and attending the August 6, 2018 mediation.

Given the nationwide scope of the proposed class and the ESI-intensive nature of the discovery at issue in this case, as well as the parties' cooperation in discovery thus far, the parties request an extension of fact discovery from the current September 7, 2018 deadline to January 25, 2019, which the parties believe will streamline their anticipated subsequent certification and dispositive motion practice.

This is the parties' second request for an extension of the fact discovery deadline; the first joint request was granted by the Court on April 9, 2018, and was made as a result of Defendant's change in counsel. The requested extension does not affect any scheduled dates other than the September 4, 2018 joint status report deadline, which the parties propose extending to January 18, 2019.

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We thank the Court for its time and consideration.

Respectfully submitted,

*/s/ Christine L. Hogan*

Christine L. Hogan

CLH/nl

cc: Justin R. Marino, Counsel for Plaintiffs (via ECF)  
J.R. Stevenson, Counsel for Plaintiffs (via ECF)